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14 *Attorneys for Plaintiff Mendez and the Class*

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17
18 JAMIE MENDEZ, an individual, on behalf
of herself and all others similarly situated

19
20 Plaintiff,

21 v.

22 C-TWO GROUP, INC.; MOBILESOTRM,
INC.; and DOES 1-50, inclusive,

23 Defendants.
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Case No.3:13-cv-05914-EMC

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
[PROPOSED] ORDER**

Current Date: May 15, 2014
Current Time: 9:00 a.m.
Courtroom: 5, 17th Floor

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:
2 Plaintiff Jamie Mendez and Defendant C-Two Group, Inc., by and through their
3 respective counsel of record, hereby stipulate as follows:

4 WHEREAS, Plaintiff filed the Complaint in this Action in state court on November 5,
5 2013;

6 WHEREAS, the Summons and Complaint were served on Defendants on November 21,
7 2014;

8 WHEREAS, Defendants removed this Action to this Court on December 20, 2013;

9 WHEREAS, this Action was assigned to this Court on January 9, 2014;

10 WHEREAS, on March 11, 2014, this Court scheduled the Case Management Conference
11 for May 15, 2014;

12 WHEREAS, Defendant C-Two Group, Inc. filed an Answer to Plaintiff's First Amended
13 Class Action Complaint on March 14, 2014;

14 WHEREAS, the Court's Minutes from Defendant MobileStorm's Motion to Dismiss
15 advises the parties that the Court intends to discuss ADR options at the Case Management
16 Conference currently set for May 15, 2014;

17 WHEREAS, pursuant to the discussions between counsel, Plaintiff believes that it is
18 necessary to add additional parties that may be liable for some or all of Plaintiff's allegations in
19 the First Amended Class Action Complaint;

20 WHEREAS, Plaintiff is currently investigating the identities of all other potential parties
21 to this case in order to properly bring them before the Court prior to the Case Management
22 Conference;

23 WHEREAS, it is Plaintiff's belief that any discussion of ADR will be more productive
24 with all potentially liable parties before the Court;

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1 IT IS HEREBY STIPULATED pursuant to Local Rule 7-12 and the Court's Civil
2 Standing Order that the Case Management Conference currently scheduled for May 15, 2014
3 shall be continued for 63 days, to Thursday, July 17, 2014 at 9:30 a.m.

4 Dated: April 25, 2014

KEARNEY LITTLEFIELD, LLP
STONEBARGER LAW, APC

6
7 By: /s/ Richard D. Lambert
Richard D. Lambert
8 Attorneys for Plaintiff and the Class

9 Dated: April 25, 2014

WALSWORTH, FRANKLIN, BEVINS &
McCALL, LLP

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12 By: /s/ Laurie E. Sherwood
LAURIE E. SHERWOOD
13 ALEXANDER F. PEVZNER
14 Attorneys for Defendant
C-TWO GROUP, INC.

15
16 I, Richard D. Lambert, hereby attest that pursuant to LR 5-1(i) I have on file concurrence for
17 any signatures indicated by a "conformed" signature (/s/) within this e-filed document.

18
19 /s/ Richard D. Lambert
Richard D. Lambert

20
21 **[PROPOSED] ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED. (modified)

23
24 4/28/14

25 Dated: _____

